

1 DISTRICT OF MASSACHUSETTS  
2 BOSTON, MASSACHUSETTS3 UNITED STATES )  
4 v. ) Affidavit  
5 SAMNANG MEAS )6 I, Todd I. Richards, Special Agent, Federal Bureau of Investigation (FBI),  
7 being duly sworn upon my oath, depose and state the following:8 1. I have been a Special Agent for approximately 16 years, assigned to the  
9 Boston Division of the FBI, and currently assigned to the Lowell Resident Agency.10 2. The Middlesex County District Attorney's Office has requested the  
11 assistance of the FBI in the location and apprehension of SAMNANG MEAS, date of birth:  
12 \*\*\*\*\* \*\*, 1981, social security account number, \*\*\*-\*\*-8397. A copy of the letter  
13 requesting such assistance is attached hereto.

14 3. I have conducted an investigation and determined the following:

15 a. On June 28, 2004, SAMNANG MEAS was charged with the crimes of  
16 ACCESSORY AFTER THE FACT OF MURDER in violation of Massachusetts General  
17 Law, Chapter 274 section 4, five counts of POSSESSION OF A FIREARM or  
18 AMMUNITION WITHOUT AN FID CARD in violation of Massachusetts General Law,  
19 Chapter 269, Section 10(h), CARRYING A FIREARM WITHOUT A LICENSE in  
20 violation of Massachusetts General Law, Chapter 269, Section 10(a); and POSSESSION OF  
21 A CLASS B SUBSTANCE in violation of Massachusetts General Law, Chapter 94C,  
22 Section 34.23 b. The crime of ACCESSORY AFTER THE FACT OF MURDER is a  
24 felony offense punishable by a maximum penalty of life in prison. The crime of CARRYING  
25 A FIREARM WITHOUT A LICENSE is a felony offense punishable by a maximum  
26 sentence of five years in prison.27 c. The crime of POSSESSION OF A FIREARM or AMMUNITION  
28 WITHOUT AN FID CARD is a misdemeanor offense punishable by a maximum penalty of

1 two years in prison. The crime of POSSESSION OF A CLASS B SUBSTANCE is a  
 2 misdemeanor offense punishable by a maximum sentence of one year.

3                   d. On June 28, 2004, warrants were issued by the Lowell, Massachusetts  
 4 District court for the arrest of SAMNANG MEAS.

5                   e. Law enforcement efforts to locate SAMNANG MEAS within the  
 6 Commonwealth of Massachusetts since that date have been unsuccessful.

7                   4. Following a diligent investigation by local, state and federal authorities, it  
 8 has been determined that SAMNANG MEAS is no longer residing in the Commonwealth of  
 9 Massachusetts.

10                  5. As a result of investigation by law enforcement authorities, it is believed  
 11 that SAMNANG MEAS has fled from Providence, Rhode Island where he was last  
 12 observed, to North Carolina.

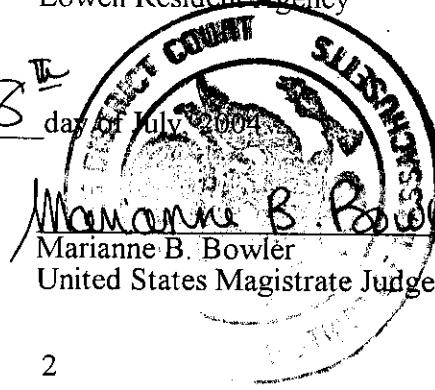
13                  6. Assistant District Attorney THOMAS F. O'REILLY has informed me that  
 14 the Middlesex District Attorney will rendite SAMNANG MEAS if he is apprehended in the  
 15 United States or abroad.

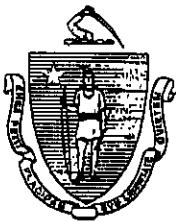
16                  7. Attached hereto and made part hereof are copies of the criminal complaint  
 17 and warrant for arrest issued by the Lowell District Court for the apprehension of  
 18 SAMNANG MEAS.

19                  8. Based upon the foregoing and upon my training as a Special Agent of the  
 20 FBI, there is probable cause to believe that SAMNANG MEAS has fled the Commonwealth  
 21 of Massachusetts.

*Todd I. Richards*  
 Todd I. Richards  
 Special Agent  
 Federal Bureau of Investigation  
 Lowell Resident Agency

22                  Subscribed and sworn to before me this 8 day of July, 2004.





THE COMMONWEALTH OF MASSACHUSETTS  
MIDDLESEX DISTRICT ATTORNEY  
151 WARREN STREET, SUITE 100, LOWELL MA.01852

MARTHA COAKLEY  
DISTRICT ATTORNEY

Tel: (978) 458-4440  
Fax: (978) 452-1404

July 6, 2004

Michael J. Sullivan  
United States Attorney  
U.S. Courthouse, Suite 9200  
1 Courthouse Way  
Boston, MA 02210

Re: Commonwealth v. Daniel Keo Kung  
AND  
Commonwealth v. Samnang Meas

Dear Mr. Sullivan:

The above named individuals are the subject of outstanding warrants. Daniel Keo Kung is wanted for Murder and Illegal Possession of a Firearm; (Warrant: #0411CR004281). Samnang Meas is wanted for Accessory After the Fact to Murder, four counts of Possession of a Firearm Without FID, Illegal Possession of Ammunition, Possession of Class B substance and Illegal Possession of a Firearm (Warrant #: 0411CR004280). Both warrants were issued by the Lowell District Court on June 28, 2004.

I have enclosed certified copies of these warrants and the complaint applications for your review. This Office requests the assistance of the U.S. Department of Justice in obtaining their presence in this jurisdiction through the unlawful flight to avoid prosecution statute. This Office will extradite both Mr. Kung and Mr. Meas within the United States. The case officer is Detective Christopher T. Doolin, Lowell Police, 978-937-3242. The assigned prosecutor is Elizabeth A. Dunigan, 978-458-4440, ext. 410. If additional information is necessary, please call.

Very truly yours,

Thomas F. O'Reilly  
Assistant District Attorney  
Chief, Lowell Division  
Middlesex County  
151 Warren Street, Suite 100  
Lowell, MA 01852  
(978) 458-4440, ext. 404

The within named complainant requests that a complaint issue against the within named defendant, charging said defendant with the offense(s) listed below.

DATE OF APPLICATION 6/25/04 DATE OF OFFENSE 6/24/04 PLACE OF OFFENSE Lowell, MA

Lowell District Court  
41 Hurd Street  
Lowell, MA. 01852

NAME OF COMPLAINANT Det. C. Doolin

ADDRESS AND ZIP CODE OF COMPLAINANT Lowell PD

50 Arcand Drive, Lowell, MA

NAME, ADDRESS AND ZIP CODE OF DEFENDANT

Meas, Seminang  
39 Shaffer ST  
Lowell, MA

COURT USE ONLY → A hearing upon this complaint application will be held at the above court address on

DATE OF HEARING

TIME OF HEARING

AT

COURT USE ← ONLY

**CASE PARTICULARS — BE SPECIFIC**

NO.	NAME OF VICTIM Owner of property, person assaulted, etc.	DESCRIPTION OF PROPERTY Goods stolen, what destroyed, etc.	VALUE OR PROPERTY Over or under \$250.	TYPE OF CONTROLLED SUBSTANCE OR WEAPON Marijuana, gun, etc.
1	Ponartih Wong			
2	Comm OF MASS.			.22 CAL. PISTOL
3	11 11 11			MOSSBERG 12 GAUGE SHOTGUN
4	11 11 11			REMINGTON 20 GAUGE SHOTGUN

OTHER REMARKS:

L.P.D. CASE # 04-11244

In testimony that the foregoing is a true copy on file and of record made by photographic process, I hereunto set my hand and affix the seal of the District Court of Lowell this day of JULY 1 2004

**DEFENDANT IDENTIFICATION INFORMATION — Complete data below**

DATE OF BIRTH	PLACE OF BIRTH	SOCIAL SECURITY NUMBER	SEX	RACE	HEIGHT	WEIGHT	EYES	HAIR
6/8/81	Thailand	031 64 8397	M	A	5'10"	180	Brown	Brown
OCCUPATION	EMPLOYER/SCHOOL	MOTHER'S NAME (MAIDEN)				FATHER'S NAME		
		Bour Soeu				Henry Meas		

↓ COURT USE ONLY ↓

DATE	DISPOSITION	AUTHORIZED BY
	NO PROCESS TO ISSUE <input type="checkbox"/> At request of complainant <input type="checkbox"/> Complainant failed to prosecute <input type="checkbox"/> Insufficient evidence having been presented	
	PROCESS TO ISSUE <input type="checkbox"/> Sufficient evidence presented <input type="checkbox"/> Defendant failed to appear	TYPE OF PROCESS <input type="checkbox"/> Warrant <input type="checkbox"/> Summons returnable
	<input type="checkbox"/> Continued to	
COMMENTS		

ARREST HEARING SUMMONS WARRANT

COURT DIVISION

The within named complainant requests that a complaint issue against the within named defendant, charging said defendant with the offense(s) listed below.

DATE OF APPLICATION

DATE OF OFFENSE

PLACE OF OFFENSE

6/25/04

6/24/04

Lowell, MA

Lowell District Court

41 Hurd Street

Lowell, MA 01852

NAME OF COMPLAINANT

Det. C. Doolin

NO.

OFFENSE

G.L. Ch. and Sec

ADDRESS AND ZIP CODE OF COMPLAINANT

Lowell PD

Poss. Firearm w/o  
FID

269

10(a)

50 Arcand Drive, Lowell, MA

Illeg. Poss. of Ammo.

269

10(a)

NAME, ADDRESS AND ZIP CODE OF DEFENDANT

Meas, Samrang  
39 Shaffer St  
Lowell, MA

3.

Poss. Class B.

94c

34

4.

Illeg. Poss. of  
Firearm

269

10(a)

COURT USE  
ONLY →A hearing upon this complaint application  
will be held at the above court address on

DATE OF HEARING

TIME OF HEARING

AT

COURT USE  
← ONLY

## CASE PARTICULARS — BE SPECIFIC

NO.	NAME OF VICTIM Owner of property person assaulted, etc.	DESCRIPTION OF PROPERTY Goods stolen, what destroyed, etc.	VALUE OR PROPERTY Over or under \$250.	TYPE OF CONTROLLED SUBSTANCE OR WEAPON Marijuana, gun, etc.
1	Comm OF MASS			REMINGTON .308 CAL. RIFLE
2	n n n			VARIOUS CALIBER OF AMMUNITION
3	n n n			COCAINE
4				

OTHER REMARKS:

LPD CASE #

04-11244

In testimony that the foregoing is a true  
copy on file and of record made by photo-  
graphic process, I hereunto set my hand and  
affix the seal of the District Court of Lowell  
this 1 day of July 2004

X ...

SIGNATURE OF CLERK/STAFF/JUDGE

## DEFENDANT IDENTIFICATION INFORMATION — Complete data below if known.

DATE OF BIRTH	PLACE OF BIRTH	SOCIAL SECURITY NUMBER	SEX	RACE	HEIGHT	WEIGHT	EYES	HAIR
6/8/81	Thailand	031 64 8397	m	A	5'04	180	Brn	Brn
OCCUPATION	EMPLOYER/SCHOOL	MOTHER'S NAME (MAIDEN)		FATHER'S NAME				

Bour Soeu

Henry Meas

↓ COURT USE ONLY ↓

DISPOSITION

AUTHORIZED BY

## NO PROCESS TO ISSUE

- At request of complainant
- Complainant failed to prosecute
- Insufficient evidence having been presented

## PROCESS TO ISSUE

- Sufficient evidence presented
- Defendant failed to appear

## TYPE OF PROCESS

- Warrant
- Summons returnable

COMMENTS

Continued to

## Lowell District Court

TO ANY AUTHORIZED OFFICER:  
REASON FOR WARRANT

Representation of prosecutor that defendant may not appear unless arrested.

Defendant failed to appear after being summoned to appear.

Defendant failed to appear after recognizing to appear.

Defendant failed to pay court ordered monies in the amount of \$\_\_\_\_\_.

Defendant failed to pay non-criminal motor vehicle fine in the amount of \$\_\_\_\_\_.

Defendant failed to appear for Probation Surrender Hearing

Other:

Lowell		NAME, ADDRESS AND ZIP CODE OF DEFENDANT					
MEAS, SAMNANG 39 SHAFFER ST. LOWELL, MA 01852							
DATE OF BIRTH	SEX	RACE	HEIGHT	WEIGHT	EYES	HAIR	
06/08/1981	M	A	5'10"	180	BRO	BRO	
C.C. #		SOCIAL SECURITY #					
		031-64-8397					
DATE OF OFFENSE	PLACE OF OFFENSE						
06/24/2004	LOWELL						
COMPLAINANT	POLICE DEPARTMENT						
LAFERRIERE, PAUL	LOWELL PD - COMMUNIC						
DATE OF COMPLAINT	RETURN DATE AND TIME						
06/28/2004							
COUNT-OFFENSE							
1 - 274/4 ACCESSORY AFTER THE FACT c274 §4							

on 06/24/2004, knowing that DANIEL KEO KUNG had committed a felony, to wit: MURDER, did harbor, conceal, maintain or assist such person, with the intent that such person should avoid or escape detention, arrest, trial or punishment, in violation of G.L. c.274, §4. (NO DISTRICT COURT FINAL JURISDICTION IN ADULT SESSION.)

## COUNT-OFFENSE

## 1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): item to be ordered forfeited.)

In testimony that the foregoing is true to the best of my knowledge and belief, I hereby set my hand and affix the seal of the District Court of Lowell  
 this \_\_\_\_\_ day of July - 2004


 CLERK MAGISTRATE

## COUNT-OFFENSE

## 1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): item to be ordered forfeited.)

## COUNT-OFFENSE

## 1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): item to be ordered forfeited.)



THE COURT HAS ORDERED THAT A  WARRANT  DEFAULT WARRANT ISSUE AGAINST THE ABOVE DEFENDANT

Therefore you are hereby commanded to arrest the above named defendant and bring the defendant forthwith before this court to answer to the offense(s) listed above and to be dealt with according to law.

FIRST JUSTICE	DATE OF ISSUE	CLERK-MAGISTRATE/ASST. CLERK
WITNESS: _____	06/28/2004	

## ADDITIONAL COUNTS

## COUNT-OFFENSE

## 1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): item to be ordered forfeited.)

## COUNT-OFFENSE

## 1 - 269/10/G FIREARM WITHOUT FID CARD, POSSESS c269 §10(h)

on 06/24/2004 did own, possess or transfer possession of a firearm, rifle, shotgun or ammunition without complying with the requirements relating to firearm identification cards as provided for in G.L. c.140, §129C, in violation of G.L. c.269, §10(h). (PENALTY: jail or house of correction not more than 2 years; or not more than \$500; §10(c): item to be ordered forfeited.)

## COUNT-OFFENSE

## 1 - 269/10/J FIREARM, CARRY WITHOUT LICENSE c269 §10(a)

on 06/24/2004 did knowingly have in his or her possession, or under his or her control in a vehicle, a firearm, as defined in G.L. c.140, §121, or a rifle or shotgun, not then being present in or on his or her residence or place of business, and not having in effect a license to carry firearms or otherwise being authorized by law to do so, in violation of G.L. c.269, §10(a). (PENALTY: state prison not less than 2½ years, not more than 5 years; or jail or house of correction not less than 1 year, not more than 2½ years; no continuance with a finding, filing, or suspended sentence; no reduction of sentence, probation, parole, furlough, or sentence deduction until 1 year served; §10(c): firearm, rifle or shotgun to be ordered forfeited.)

## COUNT-OFFENSE

## 1 - 94C/34/C DRUG, POSSESS CLASS B c94C §34

on 06/24/2004, not being authorized by law, did knowingly or intentionally possess a controlled substance in Class B of G.L. c.94C, §31, to wit: COCAINE, in violation of G.L. c.94C, §34. (PENALTY: imprisonment not more than 1 year; or not more than \$1000; or both.)

In testimony that the foregoing is a true copy on file and of record made by photographic process, I hereunto set my hand and affix the seal of the District Court of Lowell  
this \_\_\_\_\_ day of \_\_\_\_\_

CLERK-MAGISTRATE

## COUNT-OFFENSE

**COPY**

## COMPLAINANT

X

SWORN TO BEFORE CLERK-MAGISTRATE/ASST. CLERK

X

ON (DATE)

6/28/04